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9 **UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

10 ORANGE COUNTY COASTKEEPER, a  
11 California non-profit corporation,

12 Plaintiff,

13  
14 v.

15 HIXSON METAL FINISHING, a California  
16 corporation; FPC Management LLC, a  
17 California limited liability company; Reid  
18 Washbon, an individual, as Trustee of the  
Reid Washbon Trust,

19 Defendants.

Civil Case No. 8:22-cv-932-JVS (DFMx)

**NOTICE OF TENTATIVE  
SETTLEMENT**

1       **PLEASE TAKE NOTICE** that the parties have reached a tentative settlement in  
2 this proceeding. Their agreement is reflected in the proposed Consent Decree attached to  
3 this notice as “Exhibit A,” a copy of which is being sent to the United States Department  
4 of Justice (“DOJ”) and the United States Environmental Protection Agency (“EPA”) for  
5 a 45-day review period as required under Section 135.5 of Title 40 of the Code of Federal  
6 Regulations. Plaintiff will provide the Court with the written notice of commencement of  
7 the 45-day review period once Plaintiff receives that notice from DOJ. At the end of the  
8 45-day review period, Plaintiff will notify the Court of any objections received from the  
9 reviewing agencies and will submit the proposed Consent Decree for consideration and  
10 approval by this Court.

11       Should the Court require any additional information, the undersigned will be  
12 pleased to provide it upon request.

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14       Dated: October 21, 2022

Respectfully submitted,

15       ORANGE COUNTY COASTKEEPER

16       /s/ Lauren Chase

17       Lauren Chase

18       Attorney for Plaintiff

19       Orange County Coastkeeper